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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Motors Liquidation Company, *et al*. f/k/a General Motors Corp., *et al*.

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

NOTICE OF APPOINTMENT OF GOODWIN PROCTER LLP AS DESIGNATED COUNSEL FOR IGNITION SWITCH PLAINTIFFS IN PRE-CLOSING ACCIDENT LAWSUITS

Notice is hereby given that Goodwin Procter LLP has been appointed to serve as "Participating Counsel" in *In re General Motors LLC Ignition Switch Litigation*, 14-MD-2543 (JMF) (S.D.N.Y.) (the "MDL Proceeding"). The foregoing appointment was made by Plaintiffs' Lead Counsel pursuant to Order No. 13 in the MDL Proceeding (Organization of Plaintiffs' Counsel, Protocols for Common Benefit Work and Expenses).

In its role as Participating Counsel in the MDL, Plaintiffs' Lead Counsel has appointed Goodwin Procter LLP to serve as "Designated Counsel" in these proceedings to oppose the Pre-Closing Accident Motion to Enforce on behalf of ignition switch plaintiffs in Pre-Closing Accident Lawsuits.

Dated: October 15, 2014 Respectfully submitted,

/s/ William P. Weintraub
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¹ Capitalized terms used herein that are not otherwise defined shall have the meanings ascribed in this Courts' Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. § § 105 and 363 to Enforce Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits [Docket No. 12897].

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CERTIFICATE OF SERVICE

I, William P. Weintraub, hereby certify that a copy of the foregoing *Notice of Appointment of Goodwin Procter LLP as Designated Counsel for Ignition Switch Plaintiffs in Pre-Closing Accident Lawsuits*, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 15, 2014.

/s/ William P. Weintraub
William P. Weintraub